

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

MARCUS MIAL,	:	
Plaintiff	:	
v.	:	Case No.: 1:11-cv-921
JENNIFER SHERIN, et al.,	:	
Defendants.	:	

DEFENDANTS' RULE 16 DISCOVERY PLAN

COME NOW the Defendants, Jennifer Sherin, Nathan Ferguson, Brian Sayre, and Nicholas Altom (hereinafter referred to collectively as "Defendants") by and through their counsel, Alexander Francuzenko, Esq., and the law firm of Cook Craig & Francuzenko, PLLC, and pursuant to the Court's Order and Rule 16 of the Federal Rules of Civil Procedure, file the following Discovery Plan:

1. Claim

Plaintiff, Marcus Mial asserts that the Defendants, violated his Fourth and Fourteenth Amendment rights. Plaintiff is seeking actual damages, punitive damages, legal fees, and expenses in this cause of action.

2. Defenses

Defendants, Sherin, Ferguson, Sayre, and Altom deny the allegations made by the Plaintiff in his Complaint. Defendants incorporate by reference the defenses asserted in their Answers to Plaintiff's Complaint.

3. Settlement

At this point, settlement discussions have not taken place. The Defendants will explore settlement possibilities as the case progresses.

4. Trial

Defendants are not willing to consent to a Trial before a United States Magistrate Judge at this time.

5. Rule 26(a)(1) Disclosure

The parties previously exchanged disclosures, therefore there is no need to do so again.

6. Discovery

Discovery has been conducted and concluded. Defendants will object to any additional discovery being performed.

7. Expert Deadlines

Expert disclosures have been exchanged. Defendants will object to any additional expert disclosures being performed.

8. Federal Rules of Civil Procedure, Rule 26(f)(3)

Any electronically stored information that is requested in discovery shall be identified as such, but may be produced in written form unless requesting counsel, in good faith, believes that disclosure of any particular information would be more useful in an electronic format and requests electronic production.. Recorded aural information (e.g., all communications involving the parties via telephone, radio, etc.) and will be produced in audio format as well as via any transcript that has been made thereof.

9. Federal Rules of Civil Procedure, Rule 26(f)(4)

Any claims of privilege or protections related to trial preparation material made with regard to discovery responses will be addressed in an appropriate log. The objecting party will identify the documents and/or information which is protected and the basis for the protection in log form and produce such log to the opposing side. Information protected by the attorney-client privilege and work product may be designated in summary form, so that standard communication between client and counsel and counsel's file not be designated in particularity.

_____/s/_____
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Counsel for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have served a copy of the foregoing Defendants' Rule 16 Discovery Plan, via first class mail, postage prepaid, this the 30th day of April, 2014 to *pro se* Plaintiff as follows:

Marcus Mial, *Pro Se*
20010 Palmer Classic Parkway
Ashburn, VA 20147

_____/s/_____
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